

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HECTOR MORGAN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 07-720
)	
DAVID A. MARSH and WAYNE STORAGE)	
CO. T/A WAYNE MOVING & STORAGE)	
COMPANY, INC.)	
)	
Defendants.)	

**PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANTS**

Plaintiff, by and through their attorneys, hereby request that the defendant Wayne Storage Co. produces and permits plaintiff to inspect and copy the following documents within thirty (30) days of the service of this request. This First Request For Production of Documents is continuing in nature. Instructions and definitions found in the preamble to Plaintiff's First Set of Interrogatories directed to the Third Party Defendant are incorporated herein by reference, as if the same were set forth at length, to the following First Request For Production of Documents.

REQUEST FOR PRODUCTION

1. All reports and statements referring to, related to, and/or including the incident, whether signed or unsigned, handwritten, typewritten, or recorded by mechanical or electronic means including verbatim, written transcriptions made by:

- (a) the plaintiff;
- (b) the defendant;
- (c) all witness as to the occurrence;
- (d) all persons on the scene immediately before and/or after the occurrence;
- (e) all persons with direct knowledge of condition of the floor in the area at time of and immediately proceeding the occurrence; and

(f) all present or former employees of the third party defendant having knowledge of the occurrence.

RESPONSE:

2. All photographs that show or purport to show any persons, scenes, locations, objects, personal or real property, or any other matters that pertain to the occurrence.

RESPONSE:

3. Copies of all reports of investigation, findings of fact or results of inspection, observation of fact or circumstances, or any other matter relating to any aspect of this litigation;

RESPONSE:

4. The work log or other employment records showing time and hours worked daily by employee David A. Marsh during the week immediately preceding and including the date of the accident.

RESPONSE:

/s/ Bruce L. Hudson
Bruce L. Hudson, Esq.
Bar I.D. # 1003
Law Office of Bruce L Hudson
800 King Street, Suite 302
Wilmington, DE 19801
Attorney for Plaintiff

Dated: May 16, 2008

CERTIFICATE OF SERVICE

I, Bruce L. Hudson, Esq., hereby certify that on this 16th day of May, 2008, Plaintiff's First Set of Requests for Production Directed to Defendants was served upon Delia Clark, Esq., via U.S. Mail and electronic filing.

By: /s/ Bruce L. Hudson
Bruce L. Hudson, Esq.
BAR I.D. No. 1003
800 King Street, Suite 302
Wilmington, DE 19801
(302)656-9850
Attorney for Plaintiff